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December 23, 2020

BY CM/ECF AND EMAIL

Hon. Analisa Torres,
United States District Court,
Southern District of New York,
Daniel Patrick Moynihan U.S. Courthouse,
500 Pearl Street,
New York, NY 10007-1312.

Re: Contrarian Capital Management LLC, et al. v. Bolivarian Republic of Venezuela, 19 Civ. 11018 (S.D.N.Y.) (rel. Nos. 18 Civ. 11940 and 19 Civ. 03123)

Dear Judge Torres:

I write on behalf of Defendant the Bolivarian Republic of Venezuela (the "Republic") in the above-captioned action (the "Action"). On October 1, 2020, this Court entered an order that, among other things, directed Plaintiffs to submit a motion for attorney's fees by October 30, 2020, and the Republic to oppose any such motion by November 30, 2020. ECF No. 74. On October 30, Plaintiffs filed their Motion for Attorney Fees ("Plaintiffs' Fee Motion"). ECF Nos. 82-23. The parties have made two prior extension requests, which the Court granted. ECF Nos. 85-88.

The parties are continuing to engage in active, good faith discussions to attempt to reach a consensual resolution to this matter. While productive, those discussions have not yet concluded. In order to allow those discussions to continue, the parties have agreed to a three-week extension of the Republic's time to oppose Plaintiffs' Fee Motion. Accordingly, in an effort to avoid further litigation in this Action, the Republic respectfully requests that the Court extend the deadline for its opposition to January 18, 2021.

GRANTED. By January 18, 2021, Defendant shall submit its opposition to Plaintiffs' motion for attorneys' fees.

SO ORDERED.

Dated: December 28, 2020

New York, New YOrk

ANALISA TORRES
United States District Judge